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**The Constitutional Law Center for Muslims in America is the legal division of the Muslim Legal Fund of America.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

COREY GERWASKI,

Case No. 2:24-cv-00985-APG-MDC

Plaintiff,

V.

STATE OF NEVADA, ex rel. BOARD
OF REGENTS of the NEVADA
SYSTEM OF HIGHER EDUCATION,
on behalf of the UNIVERSITY OF
NEVADA, LAS VEGAS; CHRISTOPHER
HEAVEY, in his official capacity as current UNLV
Interim President; AJP
EDUCATIONAL FOUNDATION INC.,
a California Non-Profit Corporation;
STUDENTS FOR JUSTICE OF
PALESTINE-UNLV; NATIONAL
STUDENTS FOR JUSTICE OF
PALESTINE; NEVADANS FOR
PALESTINIAN LIBERATION;
DOES I-XX and ROE entities I-XX.

**STIPULATION TO EXTEND DEADLINE TO
FILE RESPONSIVE PLEADING**

(First Request)

Defendants.

1 It is hereby stipulated between undersigned counsel for Plaintiff and counsel for Defendant AJP
 2 Educational Foundation, Inc., counsel for Defendant Students for Justice in Palestine – UNLV, and
 3 counsel for Defendants Board of Regents of the Nevada System of Higher Education on behalf of the
 4 University of Nevada, Las Vegas and Christopher Heavey that the date for Defendants' responses to
 5 Plaintiff's Second Amended Complaint shall be extended. Plaintiff filed his Second Amended Complaint
 6 (ECF No. 79) on **June 3, 2025**. Thus, pursuant to FRCP 15(a)(3), Defendants' responses are currently
 7 due on **June 17, 2025**. The parties stipulate to extend this deadline by 38 days, to **July 25, 2025**. This is
 8 the first request for an extension of the instant deadline.

9 Good cause exists to extend this deadline. Defendants AJP Educational Foundation, Inc. and
 10 Students for Justice in Palestine – UNLV intend to serve Motions for Sanctions Pursuant to FRCP 11(c)
 11 upon Plaintiff, on the grounds that his Second Amended Complaint violates FRCP 11(b). The current
 12 deadline would not allow adequate time for Defendants to draft and serve a FRCP 11(c) sanctions motion
 13 or allow adequate time for Plaintiff to appropriately correct the Second Amended Complaint and the
 14 claims therein—if he so desires—under the safe-harbor provision of FRCP 11(c)(2). Permitting the
 15 parties to engage in Rule 11 motion practice before a responsive pleading is filed promotes judicial
 16 efficiency, as it could potentially obviate the need for a responsive pleading, and prevents Defendants
 17 from expending resources responding to claims that may not pass Rule 11 muster. Plaintiff and his
 18 counsel reserve all rights regarding any potential Motion that may be served and/or filed by the
 19 Defendants.

20 Respectfully submitted,

21 Dated: June 16, 2025

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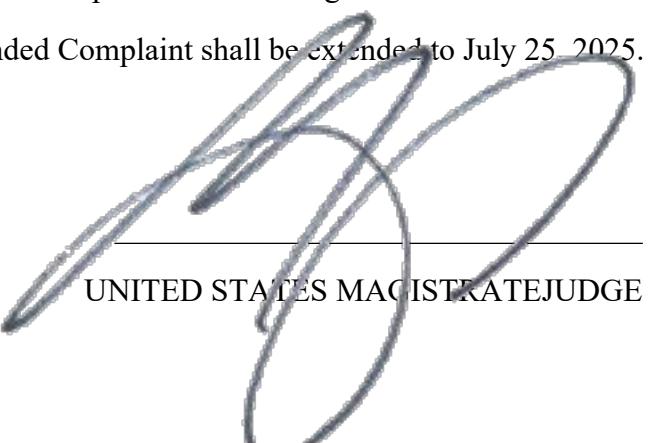
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18 Vegas*

19 ORDER

20 IT IS THEREFORE ORDERED that the Parties' Stipulation above is granted and Defendants'
21 deadline to file Responses to Plaintiff's Second Amended Complaint shall be extended to July 25, 2025.

22 Dated 6-20-25.

23 
24 UNITED STATES MAGISTRATE JUDGE
25